

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 20-cv-3699

PDV USA, INC.,  
Plaintiff,  
-vs-  
INTERAMERICAN CONSULTING INC.,  
Defendant.

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DEPOSITION OF: HUGO PERERA

DATE: Tuesday, March 8, 2022

TIME: 9:30 a.m. - 12:03 p.m.

PLACE: ALEXANDER F. FOX P.A  
1 Alhambra Plaza  
Suite 1225  
Coral Gables, Florida 33134

STENOGRAPHICALLY

REPORTED BY: VANESSA OBAS, RPR

<p style="text-align: right;">Page 38</p> <p>1 MR. JOHNSON: Object to the form.</p> <p>2 THE WITNESS: Based on the advice of counsel, I</p> <p>3 invoke my Fifth.</p> <p>4 BY MR. SULLIVAN:</p> <p>5 Q. And isn't it also true that these cover stories</p> <p>6 were designed to conceal a money laundering scheme</p> <p>7 involving Mr. Rivera, Mr. Gorrin, Ms. Nuhfer, and</p> <p>8 yourself; isn't that right?</p> <p>9 MR. JOHNSON: Objection to form.</p> <p>10 THE WITNESS: Based on the advice of counsel, I</p> <p>11 invoke my Fifth.</p> <p>12 MR. JOHNSON: One moment, Mr. Perera. If you</p> <p>13 hear me starting to object, just allow me to please</p> <p>14 say it --</p> <p>15 THE WITNESS: Oh, I'm sorry.</p> <p>16 MR. JOHNSON: -- for the record before you</p> <p>17 respond.</p> <p>18 THE WITNESS: Okay. I'm sorry.</p> <p>19 MR. JOHNSON: I'm objecting to the form of that</p> <p>20 question. Thank you.</p> <p>21 BY MR. SULLIVAN:</p> <p>22 Q. I think I need to ask it again just because the</p> <p>23 record --</p> <p>24 So allow Mr. Jason -- Mr. Johnson time to</p> <p>25 object.</p>	<p style="text-align: right;">Page 40</p> <p>1 the CEO of ExxonMobil?</p> <p>2 A. Based on the advice of counsel, I invoke my</p> <p>3 Fifth.</p> <p>4 Q. Are you aware of any communications between</p> <p>5 David Rivera and Darren Woods in connection with the</p> <p>6 consulting services agreement?</p> <p>7 A. Based on the advice of counsel, I invoke my</p> <p>8 Fifth.</p> <p>9 Q. And as far as you're aware, no such</p> <p>10 communications ever occurred; right?</p> <p>11 A. Based on the advice of counsel, I invoke my</p> <p>12 Fifth.</p> <p>13 Q. Did you ever communicate with former United</p> <p>14 States Congressman Sam Johnson?</p> <p>15 A. Based on the advice of counsel, I invoke my</p> <p>16 Fifth.</p> <p>17 Q. Are you aware of any communications between</p> <p>18 David Rivera and Sam Johnson in connection with the</p> <p>19 consulting agreement?</p> <p>20 A. Based on the advice of counsel, I invoke my</p> <p>21 Fifth.</p> <p>22 Q. Again, as far as you're aware, no such</p> <p>23 communications ever occurred; right?</p> <p>24 A. Based on the advice of counsel, I invoke my</p> <p>25 Fifth.</p>
<p style="text-align: right;">Page 39</p> <p>1 And isn't it true that these cover stories by</p> <p>2 Mr. Rivera here in this document were designed to</p> <p>3 conceal a money laundering scheme involving Mr. Rivera,</p> <p>4 Mr. Gorrin, Ms. Nuhfer, and yourself; isn't that right?</p> <p>5 MR. JOHNSON: Object to the form.</p> <p>6 THE WITNESS: Based on the advice of counsel, I</p> <p>7 invoke my Fifth.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 Q. I have a few more questions about the</p> <p>10 consulting agreement, which, again, begins on PGA 0055.</p> <p>11 And my first question is, have you ever communicated</p> <p>12 with a person named Randy Ebner, former general counsel</p> <p>13 for ExxonMobil?</p> <p>14 A. Based on the advice of counsel, I invoke my</p> <p>15 Fifth.</p> <p>16 Q. Are you aware of any communications between</p> <p>17 David Rivera and Randy Ebner in connection with the</p> <p>18 consulting agreement?</p> <p>19 A. Based on the advice of counsel, I invoke my</p> <p>20 Fifth.</p> <p>21 Q. And as far as you're aware, no such</p> <p>22 communications ever occurred; right?</p> <p>23 A. Based on the advice of counsel, I invoke my</p> <p>24 Fifth.</p> <p>25 Q. Have you ever communicated with Darren Woods,</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. JOHNSON: I'm going to object to the form</p> <p>2 of that question.</p> <p>3 BY MR. SULLIVAN:</p> <p>4 Q. Have you ever communicated with Venezuelan</p> <p>5 politician Henry Ramos Allup, A-L-L-U-P?</p> <p>6 A. Based on the advice of counsel, I invoke my</p> <p>7 Fifth.</p> <p>8 Q. Do you know who that is?</p> <p>9 A. Based on the advice of counsel, I invoke my</p> <p>10 Fifth.</p> <p>11 Q. Are you aware of any communications between</p> <p>12 David Rivera and Henry Ramos Allup in connection with</p> <p>13 the consulting agreement?</p> <p>14 A. Based on the advice of counsel, I invoke my</p> <p>15 Fifth.</p> <p>16 Q. And as far as you're aware, no such</p> <p>17 communications ever occurred; right?</p> <p>18 MR. JOHNSON: Objection.</p> <p>19 THE WITNESS: Based on the advice of --</p> <p>20 MR. JOHNSON: Object to the form.</p> <p>21 THE WITNESS: Based on the advice of counsel, I</p> <p>22 invoke my Fifth.</p> <p>23 BY MR. SULLIVAN:</p> <p>24 Q. Have you ever communicated with Venezuelan</p> <p>25 politician Oliver Blanco?</p>

<p style="text-align: right;">Page 42</p> <p>1 A. Based on the advice of counsel, I invoke my 2 Fifth. 3 Q. Do you know who that is? 4 A. Based on the advice of counsel, I invoke my 5 Fifth. 6 Q. Are you aware of any communications between 7 David Rivera and Oliver Blanco in connection with the 8 consulting agreement? 9 A. Based on the advice of counsel, I invoke my 10 Fifth. 11 Q. As far as you're aware, no such communications 12 ever occurred; right? 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 15 invoke my Fifth. 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement 18 here on Exhibit 1, beginning on page PGA 0055, my 19 question, sir, is, are you aware of any money laundering 20 that occurred in connection with this contract? 21 A. Based on the advice of counsel, I invoke my 22 Fifth. 23 Q. Do you know whose money was being laundered in 24 connection with this consulting agreement? 25 MR. JOHNSON: Object to the form.</p>	<p style="text-align: right;">Page 44</p> <p>1 contract? 2 MR. JOHNSON: Object to the form. 3 THE WITNESS: Based on the advice of counsel, I 4 invoke my Fifth. 5 BY MR. SULLIVAN: 6 Q. And isn't it also true that David Rivera 7 participated in money laundering in connection with this 8 contract? 9 MR. JOHNSON: Object to the form. 10 THE WITNESS: Based on the advice of counsel, I 11 invoke my Fifth. 12 BY MR. SULLIVAN: 13 Q. Is it your understanding that the payments 14 contemplated by the consulting contract here were used 15 to bribe government officials? 16 MR. JOHNSON: Object to the form. 17 THE WITNESS: Based on the advice of counsel, I 18 invoke my Fifth. 19 BY MR. SULLIVAN: 20 Q. Isn't it true that, in fact, the payments made 21 pursuant to this contract were used to bribe government 22 officials? 23 MR. JOHNSON: Object to the form. 24 THE WITNESS: Based on the advice of counsel, I 25 invoke my Fifth.</p>
<p style="text-align: right;">Page 43</p> <p>1 MR. FERRO: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I 3 invoke my Fifth. 4 BY MR. SULLIVAN: 5 Q. Were you involved in money laundering in 6 connection with this contract? 7 MR. JOHNSON: Object to the form. 8 THE WITNESS: Based on the advice of counsel, I 9 invoke my Fifth. 10 BY MR. SULLIVAN: 11 Q. Do you know who else was involved in money 12 laundering in connection with the consulting agreement? 13 MR. FERRO: Object to the form. 14 MR. JOHNSON: Object to the form. 15 THE WITNESS: Based on -- on the advice of 16 counsel, I invoke my Fifth. 17 BY MR. SULLIVAN: 18 Q. Isn't it true that Raul Gorrin participated in 19 money laundering in connection with this contract? 20 MR. FERRO: Object to the form. 21 THE WITNESS: Based on the advice of counsel, I 22 invoke my Fifth. 23 BY MR. SULLIVAN: 24 Q. Isn't it also true that Esther Nuhfer 25 participated in money laundering in connection with this</p>	<p style="text-align: right;">Page 45</p> <p>1 BY MR. SULLIVAN: 2 Q. Do you know whose money was being used to bribe 3 government officials in connection with this contract? 4 MR. FERRO: Object to the form. 5 MR. JOHNSON: Object to the form. 6 THE WITNESS: Based on the advice of counsel, I 7 invoke my Fifth. 8 BY MR. SULLIVAN: 9 Q. Were you involved in orchestrating bribes to 10 government officials in connection with this contract? 11 A. Based on the advice of counsel, I invoke my 12 Fifth. 13 Q. Do you know who else was involved in 14 orchestrating bribes to government officials in 15 connection with this contract? 16 MR. RIVERA: Object to the form. 17 MR. JOHNSON: Object to the form. 18 THE WITNESS: Based on the advice of counsel, I 19 invoke my Fifth. 20 BY MR. SULLIVAN: 21 Q. Isn't it true that Raul Gorrin was involved in 22 orchestrating bribes to government officials in 23 connection with this contract? 24 MR. JOHNSON: Object to the form. 25 THE WITNESS: Based on the advice of counsel, I</p>

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